

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

Dear Commissioners:

Suburban Community Channels submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Suburban Community Channels produces and transmits over 3200 new public, education, government and community programming per year on its local PEG channels to over 31,000 subscribers located in the twelve communities in the Northeast suburbs of St. Paul, MN. SCC has one (1) MVPD provider: Comcast Xfinity. Comcast provides PEG channels on all tiers of services and provides Channels 14 and 15, (public access), channel 16, (government access), channels 18, 19, 95 (community programming), and channels 20 and 98 (educational access).

While we currently employ no closed captioning on our channel(s), we understand the importance of this service to all cable television viewers. The onscreen video programming guide of our multichannel video-programming distributor (MVPD), Comcast, does not provide a label or symbol indicating that programming have closed captions.

This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Ted Arbeiter